

# **EXHIBIT A**

## Harbour, Michael

---

**From:** Proctor, Amy  
**Sent:** Saturday, August 1, 2020 1:34 PM  
**To:** Herriot, Liv; #VLSI-Intel [Int]  
**Cc:** WH Intel-VLSI Service  
**Subject:** RE: VLSI v. Intel (N.D. Cal) (W.D. Tex.) (D. Del.) - Consent to disclose financial information in Intel v. Fortress

Liv,

VLSI does not consent to use of its confidential information in other proceedings.

Best regards,  
Amy

**Amy E. Proctor** | **Irell & Manella LLP**  
1800 Avenue of the Stars, Los Angeles, CA 90067  
310.203.7961 | [www.irell.com](http://www.irell.com)

---

**From:** Herriot, Liv <Liv.Herriot@wilmerhale.com>  
**Sent:** Tuesday, July 28, 2020 4:17 PM  
**To:** #VLSI-Intel [Int] <VLSI-Intel@irell.com>  
**Cc:** WH Intel-VLSI Service <WHIntel-VLSIService@wilmerhale.com>  
**Subject:** VLSI v. Intel (N.D. Cal) (W.D. Tex.) (D. Del.) - Consent to disclose financial information in Intel v. Fortress

Counsel,

VLSI has served estimates of its damages claims in *VLSI Technology LLC v. Intel Corp.*, 5:17-cv-05671-BLF (N.D. Cal.). VLSI served expert reports on July 21, 2020 in the *VLSI Technology LLC v. Intel Corp.*, Case No. 1:19-cv-00977 (W.D. Tex.), litigation regarding its damages claims in that matter, and we expect VLSI will serve expert reports disclosing its damages claims for the *VLSI Technology LLC v. Intel Corp.*, Case No. 1:18-cv-00966 (D. Del.), matter this Friday, July 31. VLSI has also provided discovery regarding the financial terms by which VLSI acquired all of the patents it has asserted against Intel in these matters.

Pursuant to Paragraph 66 of the protective orders governing each of the matters referenced above, Intel requests VLSI's consent for Intel to disclose the financial terms of VLSI's patent acquisitions and VLSI's damages claims in Intel's Amended Complaint for the *Intel Corp. et al. v. Fortress et al.*, 3:19-cv-07651-EMC (N.D. Cal.), matter. Please confirm by Friday, July 31 whether VLSI consents. If this disclosure is permitted, we will seek to seal all portions of the Amended Complaint that reveal such details.

Thank you,  
Liv

**Liv Herriot** | **WilmerHale**  
950 Page Mill Road  
Palo Alto, CA 94304 USA  
+1 650 858 6138 (t)

+1 650 858 6100 (f)

[liv.herriot@wilmerhale.com](mailto:liv.herriot@wilmerhale.com)

**Please consider the environment before printing this email.**

---

This email message and any attachments are being sent by Wilmer Cutler Pickering Hale and Dorr LLP, are confidential, and may be privileged. If you are not the intended recipient, please notify us immediately—by replying to this message or by sending an email to [postmaster@wilmerhale.com](mailto:postmaster@wilmerhale.com)—and destroy all copies of this message and any attachments. Thank you.

For more information about WilmerHale, please visit us at <http://www.wilmerhale.com>.